

To: Public Water Systems with more than 500 service connections

From Division of Water Supply & Geoscience

RE: Water Quality Accountability Act Guidance

In the event of an emergency, public water systems may face unforeseen challenges and limitations. The Department is aware that many systems are having difficulties completing the tasks that are necessary to remain compliant with the WQAA. **Systems are strongly encouraged to continue to prioritize tasks which are directly critical to ensure that water provided to their customers remains safe but should continue to make efforts to remain in compliance with the WQAA to the extent possible.**

A detailed breakdown of the WQAA's requirements is outlined below. In general, any variance from the WQAA's requirements should be noted and appropriately accounted for in the Annual Certification Form due October 19<sup>th</sup>. If public water systems, due to conditions created by an emergency, cannot meet the requirements of the WQAA, systems should revise their inspection schedules, and/or asset management plans to account for any deviations.

**C.58:31-3 Inspections, testing by water purveyor.**

<b>Component</b>	<b>Existing Requirement</b>	<b>Alternate Recommendation</b>
Valves Greater than or equal to 12"	Inspect every 2 years – by 10/19/2019 and every other year thereafter	<ul style="list-style-type: none"><li>• During an emergency, systems may suspend inspections, but are encouraged to then “catch up” later in the inspection cycle.</li><li>• If a system is unable to catch up, the inability to comply with the inspection requirements must be stated as such in the Annual Certification Form.</li><li>• Systems must maintain documentation of how many, and which valve inspections are being postponed. Submitting this documentation should only occur upon request.</li></ul>
All other valves	Inspect every 4 years – by 10/19/2021 and every four years thereafter	

		<ul style="list-style-type: none"> <li>Note that based on deadlines in the statute, there are no valves that are due to be tested by October 2020.</li> </ul>
All fire hydrants	Test annually	<ul style="list-style-type: none"> <li>At a minimum, systems should continue to test and flush “critical” hydrants to ensure fire protection and water quality. Systems should be aware of which parts of their distribution systems meet this need.</li> <li>There is no need for DEP to approve on a case-by-case basis. Any variance from the statutory requirement must be stated in Annual Certification form.</li> </ul>
	Implement a plan for flushing hydrants and dead mains	

**C.58:31-6 Additional certifications.**

The Department does not anticipate any need for flexibility for this requirement. The Annual Certification Form should be submitted by October 19, 2020. Systems should account for any variance from the WQAA’s requirements, as well as an estimated new schedule for return to compliance using this form.

**C.58:31-7 Asset management plan; report**

If a system is unable to continue undergoing capital improvements during an emergency, including their 150-year water main replacement schedule, this variance should be disclosed on the Annual Certification Form. Asset Management Plans should also be revised to account for longer-term implications of rescheduling affected projects.

The Triennial Capital Improvement report is not due to the Department until April 2022; however, systems should continue to maintain records of their capital improvements in the interim.

Please continually check the DEP’s Division of Water Supply and Geoscience’s website available at <https://www.state.nj.us/dep/watersupply/index.html> for further updates. DEP strongly encourages that all questions, concerns and difficulties you may encounter regarding your regulatory requirements be emailed to [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov).

The DEP appreciates the public water system community’s continued dedication to protecting New Jersey's drinking water supply and its residents.